

COMMENT ON PROPOSALS* TO END CW REQUIREMENT FOR FCC HF AMATEUR LICENSE

(*RM10782, RM10783, RM10785, RM10787)

From:
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My comments take the shape of an argument based on a few simple propositions. I believe that each one of these propositions, considered separately, is true and non-controversial. The conclusion follows from the propositions: The requirement for Amateur Radio Operators to learn Morse code should be maintained in some form or fashion.

1. The Amateur radio service, over the course of the 20th century has offered the public at large and governmental authorities an invaluable communication resource in times of crisis.

Comment: I believe this proposition needs no elaboration or further support. The valuable communication resource provided by the amateur community was dramatically demonstrated most recently in the aftermath of the World Trade Center attacks when major civilian communications networks failed and governmental communication networks proved inadequate to handle the load. Amateur radio operators provided a valuable service in this case in many others.

2. "Continuous Wave" transmissions are the simplest radio communication possible. CW mode between amateurs that know how to send and receive morse code require the least equipment, and can function with a bare minimum of power and available bandwidth. When all else fails, a skilled CW operator can contact another with the most minimal equipment, using battery or solar power.

Comment: This proposition is essentially a technical principle. I do not believe any authority knowledgeable about radio energy and propagation would dispute it.

3. In order for members of the amateur service to maintain, and to enhance their skills, there must be a) specialized portions of the RF spectrum made available, and b) sufficient numbers of operators on the air at a given time. If there is no specialized CW portion of the RF band, or if there are too few operators present, amateurs wishing to contact each other will fail. It can be assumed that there is some "critical mass" of CW operators needed in order that, at any given time, someone wishing to make a CW contact can locate and communicate with a like-minded operator.

Comment: Again, I believe this proposition is true, and would not be disputed by any party in the present regulatory climate. If CW operators can not readily contact each other, then their communication contacts will diminish, as well as their skills. It can be appreciated.

4. If the Code requirement is abolished from licensing requirements, the number of CW operators will begin to fall. At some point in the future a negative "tipping point" will be reached, so that there are insufficient operators on the air at any one time to permit unscheduled (that is, without prior arrangements) contacts. When this happens the number of CW operators will begin to decrease even faster. Eventually, Morse Code/CW skills will be rare and unusual.

Comment and Conclusion

The argument is simple: Amateur radio resources are needed for disaster and emergency situations. In the face of direct attack on communication infrastructure, CW operators can provide needed minimal communications. The termination of a CW requirement for the Amateur License will mean, eventually, the reduction in number of CW operators. At some point such reduction will fall below some threshold number, so that even if desired, the learning and maintenance of CW skills will be made all but impossible.

Personal Note

I would like to add a personal note to this statement. I learned to send and receive Morse Code at age fifty. I did not find it easy, even with the help of training software and a personal computer. I wanted to become an Amateur Radio operator, but I would not have learned Morse Code if I had not been required to do so. I took, and passed, written and code (5wpm) tests on the same day (Elements 1, 2, 3), and began operating SSB several months later. After a few months of operating SSB I began to become more interested in CW, and began to practice by listening to ARRL code-learning broadcasts. Eventually (16 months after licensing) I developed my skills well enough to be able to send and receive at 12/13 wpm. I found that I enjoyed CW immensely --so much so that I now operate CW at least 90% of the time that I am on HF. I can safely say that, in the absence of an FCC requirement to learn Morse Code, I would not have done so, and i would have missed out on an activity that is a great source of enjoyment and satisfaction.